# EXHIBIT 15

| UNITED STATES BANKRUP  | TCY COURT |
|------------------------|-----------|
| SOUTHERN DISTRICT OF N | NEW YORK  |

| SECURITIES INVESTOR PROTECTION CORPORATION,   | :           | Adv. Pro. No. 08-01789 (BRL) |
|---|-------------|------------------------------|
| Plaintiff-Applicant,  | :           | SIPA LIQUIDATION             |
| v.  | :           | (Substantively Consolidated) |
| BERNARD L. MADOFF INVESTMENT<br>SECURITIES LLC,   | :           |                              |
| Defendant.  | :<br>:<br>x |                              |
| In re:  | :           |                              |
| BERNARD L. MADOFF,  | :           |                              |
| Debtor.   | :<br>:      |                              |
| IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, | :<br>:<br>: |                              |
| Plaintiff,  | :           |                              |
| v.  | :           | Adv. Pro. No. 10-04986 (BRL) |
| SHARON KNEE,  | :           |                              |
| Defendant.  | :<br>:      |                              |
|   | X           |                              |

## DEFENDANT SHARON KNEE'S RESPONSES TO TRUSTEE'S FIRST SET OF $\underline{\text{REQUESTS FOR ADMISSION}}$

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, and the Local Civil Rules of the United States District Court of the Southern District of New York and this Court, Defendant, Sharon Knee hereby hereby responds to the Requests for Admission of Plaintiff, as follows:

#### **REQUESTS FOR ADMISSION**

1. Admit that You received each of the Two-Year Transfers, or the value thereof, set forth on Exhibit B to the Complaint during the Two-Year Period.

## **Response:** Admitted

2. Admit that You received \$1,125,000 in Transfers during the Two-Year Period.

## **Response:** Admitted

3. Admit that You have no evidence that You did not receive the Two-Year Transfers, or the value thereof.

## **Response:** Admitted

4. Admit that You received each of the Six-Year Transfers, or the value thereof, set forth on Exhibit B to the Complaint during the Six-Year Period.

#### **Response:** Admitted

5. Admit that You received \$1,125,000 in Transfers during the Six-Year Period.

#### **Response:** Admitted

6. Admit that You have no evidence that You did not receive the Six-Year Transfers, or the value thereof.

## **Response:** Admitted

7. As to each of the Transfers set forth on Exhibit B to the Complaint, admit that You received the Transfers, or the value thereof, from BLMIS.

#### **Response:** Admitted

8. Admit that the total amounts of funds that You withdrew, directly or indirectly, from your Account was greater than the total amounts that You deposited, directly or indirectly, into Your Account.

#### **Response:** Denied

9. Admit that You withdrew, directly or indirectly, more money than You deposited during the Two-Year Period.

#### **Response:** Denied

10. Admit that You withdrew, directly or indirectly, more money than You deposited during the Six-Year Period.

## **Response:** Denied

11. Admit that You have not returned any of the Transfers or the value of the Transfers to the Trustee.

## **Response:** Admitted

12. Admit that at the times You received the Transfers, BLMIS was a Ponzi scheme.

#### **Response:** Denied

13. Admit that Column 4 to Exhibit B of the Complaint accurately reflects the deposits made into the Account.

## **Response:** Admitted

14. Admit that Column 5 to Exhibit B of the Complaint accurately reflects the withdrawals made from the Account.

## **Response:** Admitted

SANDAK HENNESSEY & GRECO, LLP

By: /s/ Brian A. Daley

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Attorneys for Defendant Sharon Knee

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the following was served this  $28^{th}$  day of March, 2013 by First Class mail upon the following:

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/s/ Brian A. Daley

Brian A. Daley